

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PETER KEENAN

Plaintiff

v.

UNUM PROVIDENT CORPORATION

Successor-In-Interest to PAUL REVERE

LIFE INSURANCE COMPANY and

JOSEPH P. REILLY INSURANCE AGENCY

Defendants

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Civil Action No. 02-CV-4420

**RESPONSE OF DEFENDANT, THE PAUL REVERE LIFE INSURANCE
COMPANY, TO THE CROSS-CLAIM OF DEFENDANT,
JOSEPH P. REILLY INSURANCE AGENCY**

1. The averments in this paragraph do not require a response.
2. Denied. The averments stated in the corresponding paragraph state conclusions of law to which no responsive pleading is required. It is specifically denied that defendant, the Paul Revere Life Insurance Company, is liable to the plaintiff on any allegation in the Complaint and/or liable over to the co-defendant, Joseph P. Reilly Insurance Agency pursuant to its cross-claim.

WHEREFORE, answering defendant, the Paul Revere Life Insurance Company respectfully request that judgment be entered in its favor and against all parties, together with appropriate costs and fees.

Respectfully submitted,

WHITE AND WILLIAMS LLP

By:

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Dated: September 12, 2002

Attorneys for Defendant,
The Paul Revere Life Insurance Company
of America